

DOCKET NO.

13-54

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FILED/ACCEPTED

July 5, 2013

JUL - 5 2013

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VIA HAND DELIVERY
VIA ECFS

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Applications of AT&T Inc. and Atlantic Tele-Network, Inc. for Consent to Transfer Control and Assign Licenses and Authorizations Held by Atlantic Tele-Network, Inc. and Its Subsidiaries, WT Docket No. 13-54

Dear Ms. Dortch:

Allied Wireless Communications Corporation and Atlantic Tele-Network, Inc. (collectively, "ATN") hereby provide this supplemental response to the June 5, 2013, Information and Discovery Request from the Federal Communications Commission in the above-referenced docket.¹ Enclosed, please find:

- A document providing additional information regarding the search and production methodology.
- An encrypted hard drive containing the Summation load files for applicable inquiries in the Information Request. The drive contains items tagged as "Highly Confidential" and "Confidential" per the Protective Order² and Second Protective Order.³

Pursuant to the procedures set forth in the Information Request and the Protective Orders, two copies of this Supplemental Response are being filed with the Office of the Secretary. This filing is also being filed electronically through the Commission's Electronic Comment Filing System. In addition, two copies are being delivered to Scott Patrick of the Wireless

¹ Letter from Ruth Milkman, Chief, Wireless Telecommunications Bureau, to Douglas J. Minster, Allied Wireless Communications Corporation, WT Docket No. 13-54 (June 5, 2013) ("Information Request").

² *Applications of AT&T Inc. and Atlantic Tele-Network, Inc. for Consent To Transfer Control and Assign Licenses and Authorizations*, Protective Order, WT Docket No. 13-54, DA 13-1309 (rel. June 5, 2013).

³ *Applications of AT&T Inc. and Atlantic Tele-Network, Inc. for Consent To Transfer Control and Assign Licenses and Authorizations*, Second Protective Order, WT Docket No. 13-54, DA 13-1310 (rel. June 5, 2013).

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Marlene H. Dortch

July 5, 2013

Page 2

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Telecommunications Bureau's Mobility Division. One copy of the hard drive referenced above is being submitted to the Office of the Secretary and a courtesy copy is being delivered to Mr. Patrick per his instructions.

ATN has made an effort to ensure that none of the documents submitted here are privileged under the attorney-client privilege or attorney work product doctrine, or any other applicable privilege. To the extent that any privileged documents may have been inadvertently produced, such production does not waive any applicable privilege. ATN requests that any privileged documents inadvertently produced be returned to ATN as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

Please do not hesitate to contact the undersigned should any questions arise concerning this response or the media ATN has provided.

Sincerely,



John L. Flynn
Counsel for Atlantic Tele-Network, Inc.

Encls.

FOR PUBLIC INSPECTION

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FILED/ACCEPTED

JUL - 5 2013

Federal Communications Commission
Office of the Secretary

In the Matter of)

Applications of AT&T Inc. and Atlantic)
Tele-Network, Inc. for Consent to the)
Transfer of Control of Licenses and)
Authorizations held by Atlantic Tele-Network,)
Inc. and Its Subsidiaries)

WT Docket No. 13-54

**SUPPLEMENTAL RESPONSE OF ATLANTIC TELE-NETWORK, INC. TO
INFORMATION AND DISCOVERY REQUEST DATED JUNE 5, 2013**

July 5, 2013

FOR PUBLIC INSPECTION

In response to the letter dated June 5, 2013 from Ruth Milkman, Chief of the Wireless Telecommunications Bureau, and to the accompanying Information and Discovery Request for Allied (the "Information Request"), Allied Wireless Communications Corporation and Atlantic Tele-Network, Inc. (collectively, "ATN") provide the following supplemental information and responsive documents, as applicable.

ATN is producing responsive documents, subject to the qualifications stated in its June 19, 2013 Response, based on a search and review of electronic and hard copy materials collected from the twelve agreed upon custodians, and has supplemented that collection from other ATN sources as appropriate. ATN employed relatively broad search terms¹ to identify a subset of documents that were reviewed for relevance, confidentiality, and privilege, and also reviewed documents identified independently of the search terms.² Exhibit B describes the deduplication methodology employed by ATN and its document production vendor. ATN believes that this submission completes its response to the twelve items listed in the Information Request.

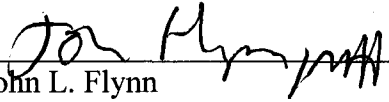
As stated in ATN's June 19, 2013 Response, any inadvertent inclusion of material subject to the attorney-client, attorney work-product, or other applicable privilege does not constitute a waiver of that privilege. ATN requests the return or destruction of all confidential material at the conclusion of this proceeding.

¹ The search strings used to identify the documents for review are provided in Exhibit A.

² For those requests seeking "all documents" for which ATN is producing family members of responsive documents, ATN designated the entire family of documents with the highest confidentiality level associated with any document in the family.

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Respectfully submitted,



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202-639-6000

Counsel for Atlantic Tele-Network, Inc.

Dated: July 5, 2013

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**EXHIBIT A
Search Terms**

Item	(sub)	Search Terms
2	a	(customer! or subscriber!) AND (view! or see or saw or think or thought or believe! or belief!) AND (“network quality” or coverage or “service plans” or pricing or promotions) and (ATN or Allied or Alltel or ANT or Aspen) (Level! or reason!) /10 churn
2	b(i)	(Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile) AND (Allied or ATN or Alltel or ANT or Aspen) AND compet!
2	b(ii)	(Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile) AND (Allied or ATN or Alltel or ANT or Aspen) AND (compet! or response or “new product” or pricing or promotion! or “retail locations” or “service offerings” or coverage) (Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile) AND (Allied or ATN or Alltel or ANT or Aspen) and (network or technology) /3 upgrade!)) (Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile) AND (Allied or ATN or Alltel or ANT or Aspen) AND (compet! or response or “new product” or pricing or promotion! or “retail locations” or “service offerings” or coverage) AND Verizon (Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile) AND (Allied or ATN or Alltel or ANT or Aspen) and (network or technology) /3 upgrade!)) AND Verizon
2	b(iii)	(spectrum /3 ((need or exhaust) or (capacity /3 constrain!))) or (((“joint venture” or merger) /10 spectrum)) or ((purchase or lease) /10 spectrum)
3		(4G or LTE or HSPA) /10 (introduce! or limit! or technology or plan!)
4	a	(Upgrade or build! or expand or improve) AND (Alltel or Allied) AND (market! or network! or service! or phone! or device!)
6	a	((subscriber! or customer!) /10 (distribut! or geography)) or (data /3 (use or usage)) or ((roaming /3 cost) /5 (increment! or extra or margin!))
7		“dropped call!” or (loss /3 signal) or churn or (network /3 quality) or ((poor or low or bad) /3 edge) or (handoff /3 (difficult! or hard or problem))
8	a	expens! /20 (geograph! or disperse or “spread out” or diverse)
8	b	(effort or try or tried or attempt!) /10 (smartphone or “new device!” or iphone or galaxy) /10 (obtain or secure or buy or contract or deal)

EXHIBIT B

Description of Deduplication Process Employed for the Document Production

Pursuant to Instruction for Submission of Electronic Documents No. C.6(b)(iii), ATN provides the following description of the deduplication methodology it has employed for the document production:

“Other ESI” type files have an MD5 digest value calculated by processing software nuix during ingestion. The results of this calculation are a string of hexadecimal characters representing the MD5 hash value for the “Other ESI” file. This MD5 Hash string value is stored in a table. Further, each subsequently extracted parent level “Other ESI” file is also hashed using the previously mentioned methodology, then compared against the database of existing MD5 hash values to determine if the newly extracted file is distinct. If the file is not distinct it is not extracted, but instead receives a value in the selection table field that reflects the item of which the current record is a duplicate.

“Email/Calendar Item” types are opened and the specified metadata text values have an MD5 digest value calculated by processing software nuix during ingestion. The results of this calculation are a string of hexadecimal characters representing the MD5 hash value of the bytes derived from the combined metadata text values of the mentioned “Email/Calendar Item” file. This MD5 Hash string value is stored in a table. Further, each subsequently extracted parent level “Email/Calendar Item” file is also hashed using the previously mentioned methodology, then compared against the database of existing MD5 hash values to determine if the newly extracted file is distinct. If the file is not distinct it is not extracted, but instead receives a value in the selection table field that reflects the item of which the current record is a duplicate.

To derive a full list of custodians for each record, the selection table is queried for a list of items that are duplicative of the first item extracted and exported for review. The custodian values are then pulled for each of the items in this list and provided as a Custodian field representing all of the custodians that were found to possess a distinct item, with semicolon delineation.

All deduplication actions occur against compound documents. In other words, if the parent hash matches a hash in the table, then the entire compound document is suppressed from extraction. Children items are evaluated for deduplication along with parent items, so that only compound documents with duplicate hash matches throughout are deduplicated.

Email fields available to be included as variables in the MD5 hashing algorithm:

- Subject Header, From Header, To Header, Cc Header, and Bcc Header.
- We include the body text tokenized whitespace and irrelevant characters.
- Binary streams are created to capture and hash attachments.

Cover Letter Spreadsheet for Atlantic Tele-Network, Inc. Production to FCC										
WT Docket No. 13-54 AT&T Inc. Acquisition of Atlantic Tele-Network, Inc. Licences										
Custodian	Hard Drive Number	Volume Name	Begin Bates Number	End Bates Number	Intentionally Left Blank	Number of Records	Number of Images	Number of Native Files	Large Spreadsheets (> 10MB)	Date Produced
Atlantic Tele-Network, Inc.	DVD	ATN001	ATN-000000001	ATN-000001002	ATN-000000168 - ATN000000195 ATN-000000819 - ATN-000000846	99	946	14	0	6/19/2013
Minster, Douglas	DVD	ATN001	ATN-000001003	ATN-000001060		28	58	13	0	6/19/2013
TOTALS FOR THIS VOLUME						127	1,004	27	0	6/19/2013
Benincasa, Justin	2187691	ATN002	ATN-000001063	ATN-000006906		623	5,844	89	0	7/5/2013
Borner, Kenneth	2187691	ATN002	ATN-000006907	ATN-000015170		858	8,264	571	2	7/5/2013
Deem, Daniel	2187691	ATN002	ATN-000015171	ATN-000016691		211	1,521	153	3	7/5/2013
Green, Mike	2187691	ATN002	ATN-000016692	ATN-000016697		5	6	1	0	7/5/2013
Handly, Lesa	2187691	ATN002	ATN-000016698	ATN-000020828		456	4,131	197	3	7/5/2013
Kreisher, Bill	2187691	ATN002	ATN-000020829	ATN-000034149		1,742	13,321	388	0	7/5/2013
Letzler, Daniel	2187691	ATN002	ATN-000034150	ATN-000043126		1,522	8,977	1,128	46	7/5/2013
Lobell, John	2187691	ATN002	ATN-000043127	ATN-000043670		61	544	29	1	7/5/2013
Mack, Janet	2187691	ATN002	ATN-000043671	ATN-000043916		26	246	18	0	7/5/2013
McGill, Gregory	2187691	ATN002	ATN-000043917	ATN-000045371		211	1,455	80	0	7/5/2013
McGill, Wade	2187691	ATN002	ATN-000045372	ATN-000045383		3	12	0	0	7/5/2013
Murray, Mark	2187691	ATN002	ATN-000045384	ATN-000045385		1	2	0	0	7/5/2013
Network Share	2187691	ATN002	ATN-000045386	ATN-000045786		4	401	0	0	7/5/2013
Omara, Frank	2187691	ATN002	ATN-000045787	ATN-000046253		44	467	15	0	7/5/2013
Prior, Michael	2187691	ATN002	ATN-000046254	ATN-000048091		151	1,838	7	0	7/5/2013
Sharepoint	2187691	ATN002	ATN-000048092	ATN-000050257		86	2,166	0	0	7/5/2013
Taylor, Brian	2187691	ATN002	ATN-000050258	ATN-000056603		658	6,346	260	0	7/5/2013
TOTALS FOR THIS VOLUME						6,662	55,541	2,936	55	7/5/2013
GRAND TOTALS						6,789	56,545	2,963	55	